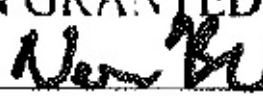


APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 3/14/23

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March 13, 2023

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Bernier et al. v. Gard Recycling, Inc. et al.,  
Case No.: 23-CV-761 (VSB)

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Dear Judge Broderick:

This firm represents Plaintiffs in the above-referenced matter. We write to respectfully request that the Court adjourn for 30 days, until April 14, 2023, Plaintiffs' deadline to move for a default judgment in accordance with the Court's February 28, 2023 order. Although Plaintiffs have served the corporate Defendants through the New York State Secretary of State, they have not yet served all individual Defendants, and therefore their time to answer has not yet expired. Should the individual Defendants retain counsel and file an answer, their counsel will almost certainly represent the corporate Defendants and move to vacate the default. To avoid that possibility, we respectfully request that the Court extend Plaintiffs' deadline to move for a default judgment for 30 days.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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Michael Taubenfeld